

February 27, 2012

Office of Waste Programs Enforcement RCRA Enforcement Division (OS-520) **Environmental Protection Agency** USEPA Ariel Rios (5101) 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460

Subject: 2011 Hazardous Waste Export Report

Dear Sir or Madam:

Enclosed is the EPA Annual Report of Hazardous Waste Exports for the Kodak Park Division of Eastman Kodak Company. This submission covers exports of hazardous waste made during the calendar year 2011.

If any further information is required, please contact Ari Cheremeteff at (585) 477-9551 or email ariadna.cheremeteff@kodak.com.

Sincerely,

Thomas C. Smithgall Health, Safety and Environment

Eastman Kodak Company

TCS/AC: Enclosure



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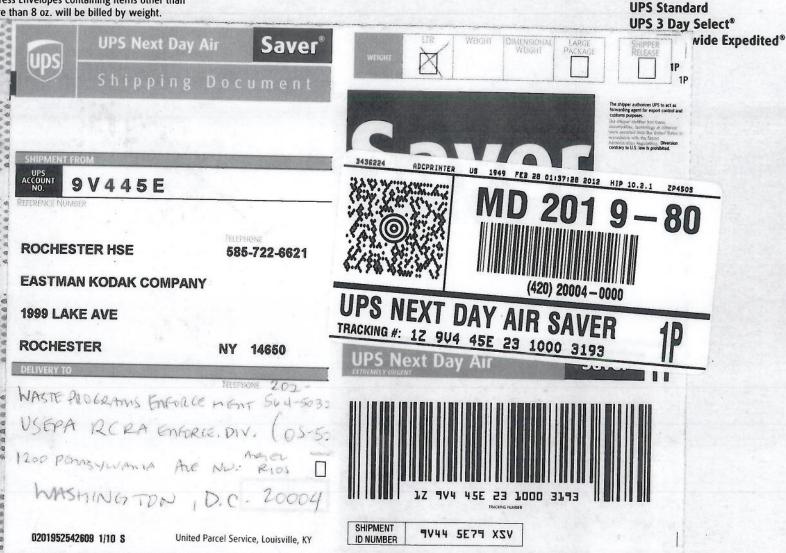
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- To qualify for the Li UPS Express Envelo

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#### ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2011

1. Legal Name and Mailing Address:

Name:

Eastman Kodak Company

EPA ID:

NYD980592497

Mailing Address:

1669 Lake Avenue

Building 56, Floor 5

Rochester, New York 14652-4543

2. Date and State of Incorporation:

01/01/1881 New York

3. Name and Address of the Registered Agent:

Eastman Kodak Company

1669 Lake Avenue

Rochester, New York 14652-3509

4. Name and Mailing Address of Each Foreign Facility to which Eastman Kodak Company Exported Hazardous Waste During the 2011 Calendar Year:

**CONSIGNEE #1** 

Name:

Xstrata Canada Corporation

EPA ID:

FC0CANADA001

Address:

Horne Smelter

156 Marcel-Baril Avenue

Rouyn-Noranda Canada, QC J9X 7C1

**CONSIGNEE #2** 

Name:

Xstrata Canada Corporation

EPA ID: Address: FC0CANADA004 Brunswick Smelter

692 Main Street

Belledune, New Brunswick

Canada, E8G 2M1

TRANSPORTER #1

Name:

Laidlaw Carriers Tank GP, Inc.

EPA ID:

MIK918959883

TRANSPORTER #2

Name:

Laidlaw Carriers Bulk GP, Inc.

EPA ID:

MIK621327675

TRANSPORTER #3

Name:

Tonawanda Transport, Inc.

EPA ID:

NYD097644801

TRANSPORTER #4:

Name:

Hazmat Environmental Group, Inc.

EPA ID:

NYD980769947

- 5. Copies of EPA Acknowledgement of Consent Documents are Included in Attachments 1 and 2.
- 6. Annual Reports for 2011:

#### WASTE/SHIPPING INFORMATION:

#### A) WASTE STREAM #1:

Description of Waste: Ash Dried Wastewater Treatment Sludge
EPA Waste Codes: F001, F002, F004, F005, F006, F007, F008, F009, F011,
F012, F019, F039, K156, K157, K158, K159, U003, U004, U006, U007, U009,
U011, U012, U014, U017, U018, U019, U021, U022, U028, U037, U039, U041,
U043, U044, U047, U048, U050, U052, U053, U061, U063, U066, U067, U068,
U069, U070, U071, U072, U075, U076, U077, U078, U079, U080, U081, U083,
U088, U091, U093, U094, U095, U098, U101, U102, U103, U107, U108, U115,
U118, U119, U120, U122, U123, U128, U129, U130, U131, U133, U136, U138,
U140, U141, U147, U148, U149, U152, U153, U156, U157, U159, U160, U162,
U165, U166, U167, U168, U169, U170, U171, U182, U185, U187, U188, U190,
U191, U193, U194, U196, U197, U200, U201, U202, U208, U209, U210, U211,
U218, U219, U220, U221, U223, U225, U226, U227, U228, U236, U244, U246,
U278, U279, U328, U353, U359, U404.

**DOT Shipping Name:** Waste Environmentally Hazardous Substances, Solid, N.O.S., 9, UN3077, III, RQ, F001, F002, F004, F005, F006, F007, F008, F009, F011, F012, F019, F039, K156, K157, K158, K159, U003, U004, U006, U007, U009, U011, U012, U014, U017, U018, U019, U021, U022, U028, U037, U039, U041, U043, U044, U047, U048, U050, U052, U053, U061, U063, U066, U067, U068, U069, U070, U071, U072, U075, U076, U077, U078, U079, U080, U081, U083, U088, U091, U093, U094, U095, U098, U101, U102, U103, U107, U108, U115, U118, U119, U120, U122, U123, U128, U129, U130, U131, U133, U136, U138, U140, U141, U147, U148, U149, U152, U153, U156, U157, U159, U160, U162, U165, U166, U167, U168, U169, U170, U171, U182, U185, U187, U188, U190, U191, U193, U194, U196, U197, U200, U201, U202, U208, U209, U210, U211, U218, U219, U220, U221, U223, U225, U226, U227, U228, U236, U244, U246, U278, U279, U328, U353, U359, U404.

DOT Hazard Class: "9"

DOT ID Code (UN.NA): UN3077

Number of Shipments during the calendar year 2011: 14 Total Volume of this Waste Shipped: 291 tons

B) WASTE STREAM #2:	
Description of Waste: EPA Waste Code:	Waste Refractory Brick D007 D011
DOT Shipping Name: Waste Class 8, PG III, (D007, D011 DOT Hazard Class: "8" DOT ID Code (UN.NA): UN	
Number of Shipments durin Total Volume of this Waste	ng the calendar year 2011: 3 Shipped: 25 tons
Not Required	PA Biennial Report
CERTIFICATION	
with the information submitte	y, that I have personally examined and am familiar ed in this and all attached documents, and that based duals immediately responsible for obtaining the

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware there are possible penalties for submitting false information including the possibility of fine and imprisonment.

Signed: _	Dilyzh	Date:	2/27/12
	122		

# **Attachment 1:**

Copy of EPA Acknowledgement of Consent Documents for Ash from Wastewater Treatment Sludge Incineration



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 28, 2011

OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

EPA Notice No.: 002092/2E/11

THOMAS C. SMITHGALL EASTMAN KODAK COMPANY 1669 LAKE AVENUE BUILDING 56, ROCHESTER, NY US 14652-4543 NYD980592497

Dear THOMAS C. SMITHGALL:

This is to acknowledge receipt of your notice, which was received by EPA on February 28, 2011, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste as specified in your notice:

Waste Stream 1: ASH FROM WASTEWATER TREATMENT SLUDGE

INCINERATION

Waste Description: ASH FROM WASTEWATER TREATMENT SLUDGE

INCINERATION

EPA Waste Code: SEE ATTACHMENT

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 1000 US Tons - (2,000 pounds)

Estimated Frequency: 50 loads Annually

Internet Address (URL) - http://www.epa.gov Recycled/Recyclable - Printed with Vegetable Oil Based Inks on 100% Postconsumer, Process Chlorine Free Recycled Paper

You may ship this waste to the following receiving facility:

### XSTRATA CANADA CORPORATION/HORNE SMELTER 156 MARCEL-BARIL AVENUE, ROUYN-NORANDA, OC. CA

Shipments may occur during the period from March 24, 2011, to March 23, 2012.

YOUR NOTIFICATION OF INTENT TO EXPORT ON WHICH THIS CONSENT IS BASED LISTED NUMEROUS EPA WASTE NUMBERS (SEE ATTACHMENT A). THIS ATTACHMENT IS INCORPORATED INTO THIS CONSENT BY REFERENCE AND MUST BE ATTACHED TO THE CONSENT COPY ACCOMPANYING EACH SHIPMENT. ONLY WASTES WITH EPA CODES INCLUDED IN THE NOTICE OF INTENT TO EXPORT AND SPECIFICALLY CONSENTED TO BY CANADA MAY BE EXPORTED.

Please be advised of the following special RCRA requirements for export shipments of hazardous waste. These requirements are found at Title 40 Code of Federal Regulations, Part 262, Subpart E - Exports of Hazardous Waste.

- 1. If the major terms of the original notice should change, you must renotify EPA. Please send your renotification to: Environmental Protection Agency, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington D.C. 20460, "Attention: Notification to Export" prominently displayed on the front of the envelope. (§262.53(c))
- 2. The hazardous waste manifest for each shipment must identify the point of departure from the United States in Item 16. (§262.54(c))
- 3. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (§262.54(h))
- 4. You must provide the transporter with an additional copy of the manifest for delivery to the U.S. Customs official at the point the hazardous waste leaves the United States in accordance with §263.20(g)(4). (§262.54(i))
- 5. You must file an exception report with the Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty-five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; and the waste is returned to the United States. (§262.55)

6. You must file an annual report by March 1 of each year with the Environmental Protection Agency, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460. (§262.56)

All shipments of hazardous waste must conform to all applicable state and federal hazardous waste regulations and transportation requirements, as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Tyria Nesmith, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number 202-564-4369, fax number, nesmith.tyria@epa.gov.

Robert G. Heiss, Director International Compliance Assurance Division

Office of Federal Activities

02092/2E/1

#### ATTACHMENT A Page 1 of 4

EPA WASTE

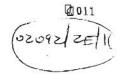
#### CODE

# HAZARDOUS WASTE CONSTITUENTS

- F001 Spent halogenated solvents used in degreasing: Tetrachloroethylene, Trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons. F002
- Spent halogenated solvents: tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloroethane, 1,2,2trichloroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-F004
- Spent Non-Halogenated Solvents: Cresols, cresylic acid, and nitrobenzene. F005 Spent Non-Halogenated Solvents: Toluene, methyl ethyl ketone, carbon
- disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and nitropropane. F006 Wastewater treatment sludges from electroplating operations. F007
- Spent cyanide plating bath solutions from electroplating operations. F008
- Plating Bath Residues from the bottom of plating baths from electroplating operations where cyanides are used in the process. F009
- Spent stripping and cleaning bath solutions from electroplating operations in P010
- Quenching bath residues from oil baths from metal heat treating operations in which cyanides are used in the process. F011
- Spent Cyanide Solutions from salt bath pot cleaning from metal heat treating F012
- Quenching wastewater treatment sludges from metal heat treating operations in which eyanides are used in the process. F019
- Wastewater treatment sludges from the chemical conversion coating of F039
- Multi-source Leachate K156
- Organic wastes from production of carbamates and carbamoyl. K157
- Wastewaters from the production of carbamates and carbamoyl oximes. K158
- Filter/separation solids from production of carbamates/carbamoyl oximes. K159 Organics from the treatment of thiocarbamates. U003
- U004 Acetophenone U006
- Acetyl chloride
- U007 Acrylamide U009
- Acrylonitrile U011 Amitrole
- U012 Aniline
- U014 Auramine
- U017 Benzal chloride
- U018 Benz [a] anthracene U019
- Benzene

(SZ 092/ ZE)

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U021
               Benzidine
      U022
               Berizo [a] pyrene
               1,2-Benzenedicarboxylic acid, [bis(2-ethyl-hexyl)] ester
      U028
      U037
              Chlorobenzene
      U039
              4-Chlorobenzene
      U041
              Epichlorohydrin
      U043
              Vinyl Chloride
      U044
              Chloroform
             beta-Chloronaphthalene
     U047
     U'048
             o-Chlorophenol
     U050
             Chrysene
     U052
             Creso!
     U053
             Crotonaldehyde
     U061
             Dichloro diphenyl trichlorethane
     U063
            Dibenz [a,h] anthracene
     U066
            1,2-Dibromo, 3-Chloropropane
    U067
            Ethylene dibromide
    U068
            Dibromomethane
    U069
            Dibutyl phthalate
    U070
            o-Dichlorobenzene
    U071
            m-Dichlorobenzene
    U072
           p-Dichlorobenzene
   U075
           Dichlorodifluoromethane
   U076
           1,1-Dichloroethane
   U077
           Ethylene dichloride
   U078
           1,1-Dichlornethylene
   U079
           1,2-Dichloroethylene
   U080
           Methylene chloride
          2,4-Dichlorophenol
   U031
  U083
           1,2-Dichloropropane
  W880U
          Diethyl phthalate
  U091
          3,3'-Dimethoxybenzidine
  U093
          Dimethylaminoazobenzenc
  U094
          7,12-Dirnethylbenz [a] anthracene
  U095
          3,3'-Dimethylbenzidine
 U098
          1,1-Dimethylhydrazine
 UIOI
         2,4-Dimethylphenol
 U102
         Dimothyl phthalate
 U103
         Dimethyl sulfate
 U107
         Di-n-octyl phthalate
 U108
         1,4-Dioxane
U115
         Ethylenc oxide
U118
        Ethyl methacrylate
U119
        Hthylmcchanesulfonate
U120
        Fluoranthene
U122
        Formaldehyde
U123
        Formic acid
U128
        1,1,2,3,4,4-Hexachloro-1,3-butadiene
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gamma-Hexachlorocyclohexane U129 Hexachlorocyclopentadiene U130 U131 Hexachloroethane U133 Hydrazine U136 Cacodylic acid U138 Iodomethane U140 Isobutyl alcohol U141 Isosafrole U147 Maleic anhydride U148 Maleic hydrazide U149 Malononitrile U152 Methacrylonitrile U153 Methanethiol U156 Methyl chlorocarbonate U157 3-Methylcholanthrene U159 Methyl ethyl ketone U160 Methyl ethyl ketone peroxide U162 Methyl methacrylate U165 Naphthalone 1,4-Naphthoquinone U166 U167 1-Naphthalenamine U168 2-Naphthalenamine U169 Nitrobenzene U170 p-Nitrophenol U171 2-Nitropropane U182 Paraldehyde Pentachloronitrobenzene U185 U187 Phonacctin U188 Pheno1 Phthalic anyhydride U190 U191 2-Picoline U193 1,3-propane sulfone U194 n-Propylamine U196 Pyridine U197 p-Benzoquinone TJ200 Reservine U201 Resorcing U202 Saccharin and salts U208 I,1,1,2-Tetrachloroethane U209 1,1,2,2-Tetrachloroethane U210 Tetrachloroethylene Carbon Tetrachloride U211 U218 Thioacetamide U219 Thiourea U220 Toluene U221 Toluenediamine Toluene diisocyanate U223

U225

Bromoform

U226	
	1,1,1-Trichloroethane
U227	1,1,2-Trichloroethane
U228	Trichloroethylene
<b>U236</b>	Trypan blue
U244	Thiram
U246	Cyanogen bromide (CN)Br
U278	Bendiocarb
U279	Carbaryl
U328	o-Toluidine
U353	p-Toluidure
<b>U359</b>	2-Ethoxyethanol
U404	Triethylamine

# Attachment 2:

Copy of EPA Acknowledgement of Consent Documents for Refractory Brick from Smelter



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

May 18, 2011

THOMAS C. SMITHGALL EASTMAN KODAK COMPANY 1669 LAKE AVENUE BUILDING 56, ROCHESTER, NY US 14652-4543 NYD980592497

EPA Notice ID: 002447/3E/11

### Dear THOMAS C. SMITHGALL:

This is to acknowledge receipt of your notice, which was received by EPA on March 28, 2011, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste as specified in your notice;

## Waste Stream 1: REFRACTORY BRICK FROM SMELTER

Waste Description: REFRACTORY BRICK FROM SMELTER

EPA Waste Code: D007, D011

DOT Shipping Name: Corrosive solids, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN1759

Total Volume to be Exported: 100 US Tons - (2,000 pounds)

Estimated Frequency: 5 loads Annually

1

You may ship this waste to the following receiving facility/foreign importer:

### XSTRATA CANADA CORPORATION BRUNSWICK SMELTER 692 MAIN STREET, BELLEDUNE, NB, CA

Shipments may occur during the period from May 11, 2011, to May 10, 2012.

Please be advised of the following special RCRA requirements for export shipments of hazardous waste. These requirements are found at Title 40 Code of Federal Regulations, Part 262, Subpart E - Exports of Hazardous Waste.

- 1. If the major terms of the original notice should change, you must renotify EPA. Please send your renotification to: Environmental Protection Agency, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington D.C. 20460, "Attention: Notification to Export" prominently displayed on the front of the envelope. (§262.53(c))
- 2. The hazardous waste manifest for each shipment must identify the point of departure from the United States in Item 16. (§262.54(e))
- 3. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (§262.54(h))
- 4. You must provide the transporter with an additional copy of the manifest for delivery to the U.S. Customs official at the point the hazardous waste leaves the United States in accordance with §263.20(g)(4). (§262.54(i))
- 5. You must file an exception report with the Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty-five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; and the waste is returned to the United States. (§262.55)
- 6. You must file an annual report by March 1 of each year with the Environmental Protection Agency, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460. (§262.56)

All shipments of hazardous waste must conform to all applicable state and federal hazardous waste regulations and transportation requirements, as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Tyria Nesmith, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number 202-564-4369, fax number, nesmith.tyria@epa.gov.

Sincerely,

Robert G. Heiss, Director

International Compliance Assurance Division

Office of Federal Activities

### Attachment 3:

Certification for Waste Minimization Activities\*

The HWRP for Kodak Park will be submitted for calendar year 2011 (January 1, 2011 – December 31, 2011) by July 1, 2012 to the New York State Department of Environmental Conservation, Division of Solid and Hazardous Materials - Bureau of Hazardous Waste Regulation.

<sup>\*</sup>As Required by The New York State Solid and Hazardous Waste Law §27-0908, an Annual Hazardous Waste Reduction Plan (HWRP) is submitted annually by July 1<sup>st</sup> of each year.